IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

MOM CA Investco LLC, et al.,1

Debtors.

Chapter 11

Case No. 25-10321 (BLS)

(Jointly Administered)

NOTICE OF AGENDA FOR TELEPHONIC HEARING ON AUGUST 18, 2025 AT 10:30 A.M. (ET)

This proceeding will be conducted remotely via Zoom.

Please refer to Judge Shannon's Chambers Procedures

(https://www.deb.uscourts.gov/judge-brendan-l-shannon) and the

Court's website (https://www.deb.uscourts.gov/ecourt-appearances)

for information on the method of allowed participation (video or audio),

Judge Shannon's expectations of remote participants,

and the advance registration requirements.

Registration is required by 4:00 p.m. (ET) the business day before the hearing unless otherwise noticed using the eCourtAppearances tool available on the Court's website.

MATTER GOING FORWARD:

1. Emergency Motion of Mohammad Honarkar and 4G Wireless, Inc. for Entry of an Order Dismissing or Converting the Chapter 11 Cases Pursuant to 11 U.S.C. § 1112(b) [Docket No. 611 – filed on June 27, 2025]

Response/Objection Deadline: June 30, 2025 at 9:30 a.m. (ET).

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The Debtors in these chapter 11 proceedings, together with the last four digits of each Debtor's federal tax identification number, are: MOM CA Investco LLC [6263], MOM AS Investco LLC [6049], MOM BS Investco LLC [6180], Retreat at Laguna Villas, LLC [2046], Sunset Cove Villas, LLC [9178], Duplex at Sleepy Hollow, LLC [9237], Cliff Drive Properties DE, LLC [0893], 694 NCH Apartments, LLC [0318], Heisler Laguna, LLC [4709], Laguna Festival Center, LLC [4073], 891 Laguna Canyon Road, LLC [0647], 777 AT Laguna, LLC [8715], Laguna Art District Complex, LLC [8316], Tesoro Redlands DE, LLC [2764], Aryabhata Group LLC [7332], Hotel Laguna, LLC [9580], 4110 West 3rd Street DE, LLC [8641], 314 S. Harvard DE, LLC [2057], Laguna HI, LLC [6408], Laguna HW, LLC [9470], The Masters Building, LLC [6134], 837 Park Avenue, LLC [3229], and Terra Laguna Beach, Inc. [2344] (interim). The Debtors' headquarters are located at 520 Newport Center Drive, Suite 480, Newport Beach, CA 92660.

Responses Received:

- i. Objection of MOM Members to Emergency Motion of Mohammad Honarkar and 4G Wireless, Inc. for Entry of an Order Dismissing or Converting the Chapter 11 Cases [<u>Docket No. 620</u> – filed on June 29, 2025]
- ii. Debtors' Statement Regarding Conversion [Docket No. 621 filed on June 30, 2025]
- iii. Statement of Banc of California With Respect to DIP Motion and Dismissal Motion [Docket No. 628 filed on June 30, 2025]
- iv. Notice of Filing of Revised Order Pursuant to Section 1112(A) and (B) of the Bankruptcy Code, (I) Converting the Debtors' Cases to Cases Under Chapter 7;
 (II) Granting the Real Property Lenders Relief from the Automatic Stay; and (III) Granting Related Relief [Docket No. 646 filed on July 14, 2025]
- v. Response of Enterprise Bank & Trust to Emergency Motion of Mohammad Honarkar and 4G Wireless, Inc. for Entry of an Order Dismissing or Converting the Chapter 11 Cases Pursuant to 11 U.S.C. § 1112(b) [Docket No. 702 filed on July 28, 2025]
- vi. Debtors' Supplement to Statement Regarding Conversion and Objection to Motion of Preferred Bank for Relief from the Automatic Stay as to Debtor Tesoro Redlands DE, LLC Pursuant to 11 U.S.C. § 362(d)(1) [Docket No. 714 filed on July 31, 2025]

Related Documents:

a. Order Shortening the Notice Period for the Motion of Mohammad Honarkar and 4G Wireless, Inc. for Entry of an Order Dismissing or Converting the Chapter 11 Cases Pursuant to 11 U.S.C. § 1112(b) [Docket No. 613 – entered on June 27, 2025]

<u>Status</u>: The Court preliminary granted the relief requested in the motion. Accordingly, this matter is going forward solely with respect to the form of order dismissing the chapter 11 cases.

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Dated: August 15, 2025

Wilmington, Delaware

Respectfully submitted,

/s/ Gregory J. Flasser

Christopher M. Samis (No. 4909) Aaron H. Stulman (No. 5807) R. Stephen McNeill (No. 5210) Katelin A. Morales (No. 6683) Gregory J. Flasser (No. 6154)

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